

RECEIVED
FEDERAL ELECTION
COMMISSION
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**BEFORE THE
FEDERAL ELECTION COMMISSION**

2004 SEP 29 P 2:14

STEVEN C. RUSSO

New York, New York 10025

Complainant,

v.

**Progress for America Voter Fund
P.O. Box 57167
Washington, DC 20037,**

**Brian McCabe
P.O. Box 57167
Washington, DC 20037,**

**Mary Anne Carter
P.O. Box 57167
Washington, DC 20037,**

**Ralph R. Brown
P.O. Box 57167
Washington, DC 20037,**

**Progress For America, Inc.
P.O. Box 19242
Washington, DC 20036,**

**The Leadership Forum,
1155 21st Street NW
Suite 330
Washington, DC 20036,**

**Susan B. Hirschman,
1155 21st Street NW
Suite 330
Washington, DC 20036,**

**L. William Paxton
1333 New Hampshire Avenue, NW
Washington, DC 20036,**

MUR NO. **5546**

SENSITIVE

27044153713

Barbara Bonfiglio,
1155 21st Street NW
Suite 330
Washington, DC 20036,

President George W. Bush
1600 Pennsylvania Avenue
Washington, DC 20500,

Vice President Richard B. Cheney
1600 Pennsylvania Avenue
Washington, DC 20500,

Bush-Cheney 2004
P.O. Box 10648
Arlington, VA 22210,

Dave Herndon, Treasurer
Bush-Cheney 2004
P.O. Box 10648
Arlington, VA 22210,

Republican National Committee
310 First Street, SE
Washington, DC 20003,

Mike Retzer, Treasurer
Republican National Committee,
310 First Street, SE
Washington, DC 20003,

Respondents.

COMPLAINT

Complainant files this complaint against the Progress For America Voter Fund ("PFAVF"), Brian McCabe, President, Mary Anne Carter, Treasurer, Ralph R. Brown, Secretary, the connected § 501(c)(4) organization Progress for America, the Leadership Forum, Susan B. Hirschman, President, L. William Paxton, Vice President, Barbara Bonfiglio, Treasurer, the Republican National Committee ("RNC") and its treasurer, Mike Retzker; President George W. Bush; Vice President Richard B. Cheney; and Bush-Cheney

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2004 and its treasurer, Dave Herndon, for violations of the reporting and contribution provision of the Federal Election Campaign Act, as described below.

PFAVF and the Leadership Forum both purport to be independent organizations, which raise and spend unlimited "soft money" to support President Bush's re-election efforts. However, the facts indicate these organizations are working hand in glove with the Bush campaign and the RNC both to raise and to spend soft money. The resulting coordinated communications are illegal contributions to the RNC and the Bush campaign.

I. FACTS

A. Establishment of Section 527 Organizations

1. Bush-Cheney 2004 and the RNC Suggested that Independent Groups Run Advertisements

Despite their incessant criticism of progressive groups, the Bush-Cheney campaign and the Republican Party have been explicit about their intent to push conservative "527" groups to spend money to promote George W. Bush's candidacy and influence the upcoming federal election. To take one example: in response to FEC actions in May 2004, a joint press release by the Chairman of the Bush-Cheney campaign and the Republican National Committee Chairman (RNC) stated that "[c]onservative groups now have the go-ahead they were waiting for as the commission has now made clear that these '527' groups will not be affected by the federal campaign finance rules, at least in 2004."¹ This release was a signal to "independent" Republican groups to raise money and attempt to influence the presidential election. As a leading press article reported, this RNC press release "astonished some GOP

¹ RNC Press Release, *Joint Statement by Bush-Cheney Campaign Chairman Marc Racicot and RNC Chairman Ed Gillespie on Today's FEC Ruling on 527 Groups*, May 13, 2004 (Attachment A).

political strategists by its explicit reference to GOP groups, interpreted as a signal to Republican donors to begin giving to these groups."²

2. PFAVF Is Established In Response to Bush's Plea for Help

Immediately after the Bush campaign and the RNC made their intentions clear, PFAVF was founded by Progress For America, Inc., a nonprofit corporation organized under section 501(c)(4) of the Internal Revenue Code ("the Code").³ PFAVF is organized under section 527 of the Code. The goal of the organization and its media campaign include:

Becom[ing] a major factor in the battleground states, and also advertise on targeted national cable networks. To effectively air one TV thirty second ad in every battleground state will cost \$9 million. At the outset depending upon resources, PFA-VF may decide to advertise only in battleground markets where we believe we can play a decisive role. These markets may cost anywhere from \$500,000 to \$1.5 million to deliver one TV 30. We may also go after targeted national cable network audiences for which the ad costs would range from \$250,000 to \$500,000.⁴

On June 24, PFAVF represented that it spent \$1 million to air advertisements in Nevada and New Mexico, "key media markets" for the presidential election.⁵ On June 30, PFAVF announced, "We've definitely struck a chord with our informational campaign about President Bush and John Kerry. As people in New Mexico and other places learn more about Kerry's record on terrorism they will raise more questions about him that he will feel

² Alexander Bolton, *GOP Leaders Reverse Field, Build A New 527 Network*, The Hill, May 19, 2004.

³ PFAVF was established on May 27, 2004. See IRS Form 8871 (Attachment B).

⁴ Progress For America Voter Fund, About PFA Voter Fund, at <http://www.pfavoterfund.com/1151-95.html>.

⁵ Press Release, Progress For America Voter Fund, Progress For America Voter Fund Releases First TV Commercial (June 24, 2004), available at <http://www.pfavoterfund.com/1151-15.1151-062804B.html>.

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compelled to answer."⁶ PFAVF recently announced that it had \$35 million in deposits and pledges.⁷

3. The Leadership Forum Also Plans to Carry Bush's Message

The Leadership Forum was established on October 28, 2002.⁸ It is also organized under section 527 of the Code. It raised \$225,000 by the end of last year,⁹ and raised over \$100,000 in the first quarter of this year.¹⁰ The President of the Leadership Forum, Susan Hirschman, has made clear that the purpose of the organization is to "raise money to get out the Republican message."¹¹

B. PFAVF and the Leadership Forum Are Coordinating with the RNC and the Bush Campaign

Although the PFAVF and the Leadership Forum have attempted to portray their activities as independent, the facts indicate that these organizations are working closely with, and financed by, the RNC and the Bush campaign.

First, there appears to be little if any separation of personnel between the Republican Party and the Campaign on the one hand, and these groups on the other. James Francis Jr., who helped assemble President Bush's "spectacularly successful Pioneer fundraising

⁶ Press Release, Progress For America Voter Fund, New Kerry Ad in New Mexico Proves PFA-VF Has Struck a Chord with Viewers (June 30, 2004), *available at* <http://www.pfavoterfund.com/1151-15.1151-063004D.html>.

⁷ Amy Fagan, *Democrats Master Art of 527s But GOP Rallies*, Wash. Times, Aug. 26, 2004.

⁸ See IRS Form 8871 (Attachment C).

⁹ See IRS Form 8872 (Attachment D).

¹⁰ See IRS Form 8872 (Attachment E).

¹¹ Jim Drinkard, *"Soft Money" May Help GOP Launch Wider Attack on Kerry*, USA Today, May 17, 2004.

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program," is a leader of PFAVF.¹² On information and belief, Tom Synhorst, a direct-mail and phone-bank specialist, is a key strategic adviser to PFAVF. Synhorst is also a partner in a direct mail and voter contact firm that has major contracts with both the Bush-Cheney '04 campaign and the Republican National Committee. On information and belief, Synhorst's company, Feather, Larson & Synhorst, has already been paid at least \$1.6 million by the Bush-Cheney campaign. Tony Feather, the lead partner, was political director of the 2000 Bush campaign. On information and belief, Feather founded the connected § 501(c)(4) organization in 2001.¹³ It is scarcely conceivable that the PFAVF's activities could not be coordinated with those of the Campaign when they have a major overlap with the same leading fundraiser and direct-mail and voter-contact adviser. Most damning, Karl Rove, President Bush's chief political strategist, and Ken Mehlman, the Bush campaign manager, spoke last year at a briefing for Progress for America,¹⁴ which PFAVF lists as its connected organization.

The Leadership Forum's president, Susan Hirschman, was formerly chief of staff to House Majority Leader Tom DeLay (R-Texas). Former U.S. Congressman Bill Paxton is Vice President of the Leadership Forum. The Leadership Forum's advisory board includes a number of prominent Republicans, including Ken Duberstein, White House chief of staff under President Reagan, former Sen. Lauch Faircloth of North Carolina, and former House members Bob Livingston of Louisiana, Tillie Fowler of Florida, Susan Molinari of New York and Bud Shuster of Pennsylvania.

Second, Republican officials have been actively helping these groups raise money. On information and belief, the Leadership Forum held a July 6 dinner featuring

¹² Thomas B. Edsall, *GOP Creating Own "527" Groups*, Wash. Post, May 25, 2004.

¹³ *Id.*

¹⁴ Glen Justice, *GOP Group Says It's Ready to Wage Ad War*, N.Y. Times, Aug. 25, 2004.

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House Speaker J. Dennis Hastert (R-Ill.),¹⁵ who, as of June 21, is a member of the Bush campaign's Illinois Leadership Team.¹⁶ On information and belief, Republican Senator Rick Santorum has also spoken to potential donors of the Leadership Forum.¹⁷ Santorum has recently been named to a Bush campaign position.¹⁸ Hastert and Santorum have "place[d] their imprimaturs on the group, reassuring donors that it is a legitimate fundraising venture. . . Hastert and Santorum will send a powerful signal to Republican donors about where they should direct their money as numerous GOP groups vie for attention."¹⁹

PFAVF has also benefited from the Republican money machine. Carl Lidner and Rick Caruso, who raised at least \$200,000 each for the Bush campaign ("Ranger" status), have contributed large amounts to PFAVF. Jerry Perenchio and Paul Singer, who have raised at least \$100,000 for the Bush campaign ("Pioneer" status), are also large contributors to PFAVF.

II. LEGAL ARGUMENT

A. The Bush Campaign Coordinated With PFAVF and the Leadership Forum

The Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431 *et seq.* (2004) ("the Act") provides, in part, that "expenditures made by any person in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized

¹⁵ Lisa Getter, *GOP Can't Beat "3rd Party" Groups, So It Forms Them*, L.A. Times, Jun 6, 2004.

¹⁶ Press Release, Bush-Cheney 2004, Inc., Bush-Cheney '04 Announces Illinois Campaign Leadership (June 21, 2004), available at <http://www.georgewbush.com/News/Read.aspx?ID=2812>.

¹⁷ Thomas B. Edsall, *Soft-Money Group Promotes Ties to GOP Leaders Despite Warnings*, Wash. Post, May 30, 2004.

¹⁸ Press Release, Bush-Cheney 2004, Inc., Bush-Cheney '04 Announces Pennsylvania Truth Squad (July 22, 2004), available at <http://www.georgewbush.com/News/Read.aspx?ID=3032>.

¹⁹ Alexander Bolton, *Leaders Back Republican 527*, The Hill, May 26, 2004.

political committees, or their agents, shall be considered a contribution to such candidate." 2 U.S.C. § 441a(a)(7)(B)(i). The term "coordinated communication" is defined in the Commission's regulations at 11 C.F.R. § 109.21 (2004). The PFAVF advertisements meet the "content" requirements of that section: the ads refer to a clearly identified candidate for public office; they are publicly distributed within 120 days of the general election; and they are directed to relevant voters.²⁰ *See id.* § 109.21(c)(4). The only question, then, is whether the advertisements meet the "conduct" standard of 11 C.F.R. § 109.21(d).

First, the evidence shows that the PFAVF ads were created, produced and distributed "at the request or suggestion of" Bush-Cheney 2004. *Id.* § 109.21(d)(1)(i). The Bush campaign explicitly signaled to outside organizations that they should proceed with such advertisements. In response, Progress For America created PFAVF, which immediately began to raise and spend money on President Bush's behalf. The Leadership Forum also began to hold fundraising events to answer the Bush campaign's plea for help.

Second, the evidence indicates that the Bush campaign has been "materially involved in," and has "substantial discussions about," the PFAVF advertisements through the intricate network of money and strategy between PFAVF, the Republican National Committee, and Bush-Cheney 2004. *See id.* § 109.21(d)(2), (3). While the overlapping personnel and contributors alone are damning, more telling still is the overt coordination between Bush campaign agents Karl Rove and Ken Mehlman and Progress for America. As noted above, Rove and Mehlman briefed Progress for America last year.²¹ At this time, PFAVF had not been created, but its personnel were affiliated with Progress for America. The PFAVF advertising campaign is tainted by the "substantial discussions" its personnel and connected

²⁰ The advertisements may be viewed on PFAVF's website, at <http://www.pfavoterfund.org>.

²¹ Justice, *supra* note 14.

organization undertook with Rove and Mehlman. The resulting ads are therefore an illegal contribution to the Bush campaign.

While the Leadership Forum has not yet made large expenditures on the Bush campaign's behalf, any expenditures will also constitute illegal contributions to the Bush campaign due to the interlocking network of advisers and funders, as detailed above, because they will be the result of cooperation and consultation with the Bush campaign and the RNC. 2 U.S.C. § 441a(a)(7)(B)(i). .

B. George Bush and Dick Cheney Have Illegally Solicited and Spent Soft Money

The Act prohibits candidates, individuals holding Federal office, agents of the foregoing, and entities "directly or indirectly established, financed, maintained, or controlled by" the foregoing from soliciting or spending funds in connection with an election for Federal office, "unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act." 2 U.S.C. § 441i(e)(1)(A). National political party committees and their agents are similarly restricted. 2 U.S.C. § 441i(a). The PFAVF advertisements, and the focus of the Leadership Forum, are in connection with a Federal election; neither organization is a registered political committee under the Act; and the funds solicited for, and spent by, the two organizations do not comply with the requirements of federal election law.

President Bush, Vice-President Cheney, Bush-Cheney 2004, its treasurer, the Republican National Committee, and its treasurer have engaged in soliciting and spending soft money in violation of the Act. PFAVF and the Leadership Forum have been funded through donations of soft money, given by a network of contributors and advisers to the Bush campaign and the Republican Party.

While this network of contributors and advisers is sufficient evidence to prove coordination, the involvement of Speaker Hastert in the fundraising efforts of the Leadership Forum, while at the same time holding a position in the Bush campaign, constitutes a *per se*

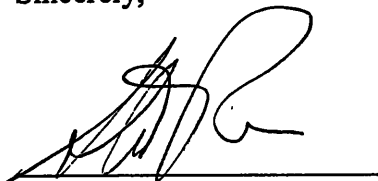
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violation of 2 U.S.C. § 441i(e)(1)(A) by both Hastert and the Bush campaign. Hastert's appearance at the Leadership Forum event was "designed to assuage concerns of prospective contributors," and the president of the Leadership Forum admitted that the audience would be "prospective donors."²² Hastert's involvement is a flagrant violation of the prohibition against candidates and federal officeholders soliciting soft money.

III. REQUESTED ACTION

As we have shown, the respondents have violated the Federal Election Campaign Act. Accordingly, we request that they be enjoined from further violations, be required to repay their illegal contributions and be fined the maximum amount permitted by law.

Sincerely,

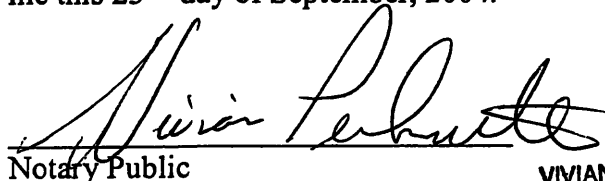


State of New York

: SS.:

County of New York

SUBSCRIBED AND SWORN to before
me this 23rd day of September, 2004.


Notary Public

VIVIAN PERLMUTTER
Notary Public, State of New York
No. 41-4520782
Qualified in Nassau County
Commission Expires February 28, 2007

Srusso/FEC Complaint

²² Edsall, *supra* note 17.

ATTACHMENT

1

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- **RNC Press Release: *Joint Statement by Bush-Cheney Campaign Chairman Marc Racicot and RNC Chairman Ed Gillespie on Today's FEC Ruling on 527 Groups, May 13, 2004;***

Joint Statement by Bush-Cheney Campaign Chairman Marc Racicot and RNC Chairman Ed Gillespie on Today's FEC Ruling on 527 Groups

DATELINE: WASHINGTON, May 13

BODY:

Following is a joint statement by Bush-Cheney Campaign Chairman Marc Racicot and RNC Chairman Ed Gillespie on today's FEC ruling on 527 groups:

"The FEC's decision today to do nothing to stop the massive spending of soft money "527" committees to influence the 2004 elections is unfortunate, but provides clarity.

"It has always been clear to us that the Bipartisan Campaign Reform Act ("BCRA") and its subsequent affirmation by the Supreme Court would limit the role of political parties in the political process and allow special interest "527" groups to proliferate. We had always assumed however, that the provisions of the Federal Election Campaign Act that have existed since the 1970's and were not changed by BCRA would require the 527s to follow the basic tenants underlying federal campaign finance law.

"We erroneously thought "527" groups would be regulated by their status and their activities. We expected that when one of these "527" groups raised and spent more than \$1,000 for the specific purpose of defeating or electing federal candidates such as President Bush or John Kerry, that particular "527" group would fall under the Federal Election Commission's umbrella as a federal political committee. In other words, the "527" would have to spend and raise federally regulated money, "hard dollars." No corporate money could be raised nor spent and individual contributions would be limited to \$5,000 per year.

"Today's decision to delay addressing fundamental questions regarding the regulation of "527's" is irresponsible. It also sets the stage for a total meltdown of federal campaign finance regulation in 2004 - the first election after BCRA supposedly banned soft money from influencing federal candidates and elections.

"The Commission by its own action, or more precisely inaction, today has given the "green light" to all non-federal "527's" to forge full steam ahead in their efforts to affect the outcome of this year's Federal elections and, in particular, the presidential race.

"Conservative groups now have the go-ahead they were waiting for as the commission has now made clear that these "527" groups will not be affected by the federal campaign finance rules, at least in 2004.

"As FEC Commissioner Michael Toner said, "Delaying a decision is making a decision- namely, that we are not going to issue any regulations for the 2004 elections. We are going to see a new 'soft money' arms race for the 2004 election." (Delay Urged for FEC Action on Pro-Democratic Groups, Washington Post, 5/12/04)

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"Look at the blatant anti-President Bush and pro-Kerry activity by MoveOn.org, The Media Fund, ACT and others. Add in their uninhibited coordination with agents of the Kerry campaign and the Democratic Party at the national and state levels. Remember that all of this information was known to the FEC during its "527" rulemaking deliberations.

"By today's action, the FEC has sanctioned the activities of these groups. Its decision sends a very clear signal to the political community -- let the "527" battle begin.

"The 2004 elections will now be a free-for-all. Thanks to the deliberate inaction by the Federal Election Commission, the battle of the 527's is likely to escalate to a full scale, two- sided war.

"Groups like the Leadership Forum, Progress for America, The Republican Governor's Association, GOPAC and others now know that they can legally engage in the same way Democrat leaning groups like ACT, the Media Fund, MoveOn and Moving America Forward have been engaging.

"Now that the Commission has spoken, or not spoken, it is all but certain that those groups that would like to see the President re-elected and the U.S. House and Senate remain in Republican control will begin raising and spending money in the same manner as those groups that would like to see the President defeated and the U.S. House and Senate in Democratic control have already been doing. Thanks to the Federal Election Commission, the "527" battle will now rage unabated through Election Day."

Paid for by the Republican National Committee
<http://www.usnewswire.com>

CONTACT: Christine Iverson of the Republican National Committee, 202-863-8614;
Web: <http://www.gop.com>

ATTACHMENT

2

27044153726

Form 8871
(Rev. July 2003)

Department of the Treasury
Internal Revenue Service

Political Organization Notice of Section 527 Status

OMB No. 1545-1893

Part I General Information

1 Name of organization

Progress For America Voter Fund

Employer identification number

20 - 1170395

2 Mailing address (P.O. box or number, street, and room or suite number)

PO Box 57167

City or town, state, and ZIP code

Washington, DC 20037

3 Check applicable box: ☒ Initial notice ☐ Amended notice ☐ Final notice

4a Date established

05/27/2004

4b Date of material change

5 E-mail address of organization

info@pfavoterfund.com

6a Name of custodian of records

Mary Anne Carter

Custodian's address

PO Box 57167

Washington, DC 20037

7a Name of contact person

Brian McCabe

Contact person's address

PO Box 57167

Washington, DC 20037

8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number

PO Box 57167

City or town, state, and ZIP code

Washington, DC 20037

9a Election authority

NONE

9b Election authority identification number

Part II Notification of Claim of Exemption From Filing Certain Forms (see instructions)

10a Is this organization claiming exemption from filing Form 8872, Political Organization Report of Contributions and Expenditures, as a qualified state or local political organization? Yes ☐ No ☒

10b If 'Yes,' list the state where the organization files reports:

11 Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt from Income Tax, as a caucus or associations of state or local officials? Yes ☐ No ☒

Part III Purpose

12 Describe the purpose of the organization

To engage in political activities that educate the general public regarding the public policy positions of candidates for federal, state, and local office and mobilize voters in compliance with federal and state laws.

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Part IV List of All Related Entities (see instructions)

13 Check if the organization has no related entities.

14a Name of related entity	14b Relationship	14c Address
Progress for America, Inc	Connected	PO Box 19242 Washington, DC 20036

Part V List of All Officers, Directors, and Highly Compensated Employees (see instructions)

15a Name	15b Title	15c Address
Mary Anne Carter	Treasurer	PO Box 57167 Washington, DC 20037
Brian McCabe	President	PO Box 57167 Washington, DC 20037

Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

Brian McCabe

05/28/2004

**Sign
Here**

Name of authorized official

Date

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ATTACHMENT

3

27044153729

Form 8871
(Rev. July 2003)

Department of the Treasury
Internal Revenue Service

Political Organization Notice of Section 527 Status

OMB No 1545-1693

Part I General Information

1 Name of organization

The Leadership Forum

Employer identification number

81 - 0576274

2 Mailing address (P.O. box or number, street, and room or suite number)

1155 21st Street, NW Suite 330

City or town, state, and ZIP code

Washington, DC 20036

3 Check applicable box:

☐ Initial notice

☒ Amended notice

☐ Final notice

4a Date established

10/28/2002

4b Date of material change

02/27/2004

5 E-mail address of organization

no@email.com

6a Name of custodian of records

Tony Zagotta

Custodian's address

1155 21st Street, NW Suite 330

Washington, DC 20036

7a Name of contact person

Tony Zagotta

Contact person's address

1155 21st Street, NW Suite 330

Washington, DC 20036

8 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number

1155 21st Street, NW Suite 330

City or town, state, and ZIP code

Washington, DC 20036

9a Election authority

NONE

9b Election authority identification number

Part II Notification of Claim of Exemption From Filing Certain Forms (see instructions)

10a Is this organization claiming exemption from filing Form 8872, Political Organization Report of Contributions and Expenditures, as a qualified state or local political organization? Yes ☐ No ☒

10b If "Yes," list the state where the organization files reports:

11 Is this organization claiming exemption from filing Form 990 (or 990-EZ), Return of Organization Exempt from Income Tax, as a caucus or associations of state or local officials? Yes ☐ No ☒

Part III Purpose

12 Describe the purpose of the organization

To engage in onofederal political activites on state and local levels and to engage in dialogue on issues of importance to all Americans.

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Part IV List of All Related Entities (see instructions)13 Check if the organization has no related entities. ☒

14a Name of related entity	14b Relationship	14c Address
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Part V List of All Officers, Directors, and Highly Compensated Employees (see instructions)

15a Name	15b Title	15c Address
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L. William Paxon	Vice President	1333 New Hampshire Avenue, NW Washington, DC 20036
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Susan B Hirschmann	President	1155 21st Street, NW Suite 300 Washington, DC 20036
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Under penalties of perjury, I declare that the organization named in Part I is to be treated as a tax-exempt organization described in section 527 of the Internal Revenue Code, and that I have examined this notice, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. I further declare that I am the official authorized to sign this report, and I am signing by entering my name below.

Barbara Bonfiglio

02/27/2004

**Sign
Here**

Name of authorized official

Date

27044153731

ATTACHMENT

4

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Form

8872

(November 2002)

Department of the Treasury
Internal Revenue Service**Political Organization
Report of Contributions and Expenditures**

OMB No 1545-1696

See separate instructions.

A For the period beginning: 07/01/ 2003 **and ending:** 12/31/2003**B Check applicable box:** ☐ Initial report ☒ Change of address ☒ Amended report ☐ Final report**1 Name of organization:** The Leadership Forum**Employer identification number:** 81 - 0576274**2 Mailing address (P.O. box or number, street, and room or suite number)**

1155 21st Street, N.W., Suite 330

City or town, state, and ZIP code

Washington, DC 20036

3 E-mail address of organization:

no@email

4 Date organization was formed:

10/28/2002

5a Name of custodian of records

Tony Zagotta

5a Custodian's address1155 21st Street, N W , Suite 330
Washington, DC 20036**6a Name of contact person**

Tony Zagotta

6b Contact person's address1155 21st Street, N.W., Suite 330
Washington, DC 20036**7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number**

1155 21st Street, N.W., Suite 330

City or town, state, and ZIP code

Washington, DC 20036

8 Type of report (check only one box)☐ First quarterly report
(due by April 15)☐ Second quarterly report
(due by July 15)☐ Third quarterly report
(due by October 15)☒ Year-end report
(due by January 31)☐ Mid-year report (Non-election
year only-due by July 31)☐ Monthly report for the month of.
(due by the 20th day following the month shown above, except the
December report, which is due by January 31)☐ Pre-election report (due by the 12th or 15th day before the election)

(1) Type of election:

(2) Date of election:

(3) For the state of:

☐ Post-general election report (due by the 30th day after general election)

(1) Date of election:

(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A). **9 \$ 225000****10 Total amount of reported expenditures (total from all attached Schedules B).** **10. \$ 0**

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true correct, and complete

Barbara Bonfiglio

03/05/2004

**Sign
Here**

Signature of authorized official

Date

27044153733

Schedule A Itemized Contributions

Schedule A

Contributor's name, mailing address and ZIP code Wyeth PO Box 13743 Philadelphia, PA 19101	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 25000	Amount of contribution \$ 25000 Date of contribution 12/08/2003
Contributor's name, mailing address and ZIP code Vivendi Universal Entertainment LLLP 1625 S. Congress Avenue Delray Beach, FL 33445	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 25000	Amount of contribution \$ 25000 Date of contribution 11/13/2003
Contributor's name, mailing address and ZIP code International Paper PO Box 286 Memphis, TN 38101	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 50000	Amount of contribution \$ 50000 Date of contribution 12/31/2003
Contributor's name, mailing address and ZIP code Mortgage Insurance Companies of America 727 15th St., NW 12th Floor Washington, DC 20005	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 25000	Amount of contribution \$ 25000 Date of contribution 12/31/2003
Contributor's name, mailing address and ZIP code United Parcel Service 335 Northmeadow Parkway Suite 119 Roswell, GA 30076	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 25000	Amount of contribution \$ 25000 Date of contribution 12/31/2003
Contributor's name, mailing address and ZIP code Northrop Grumman 1840 Century Park East Los Angeles, CA 90067	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 25000	Amount of contribution \$ 25000 Date of contribution 12/31/2003
Contributor's name, mailing address and ZIP code BellSouth Corp. 14K01-1155 Peachtree Street NE Atlanta, GA 30309	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 25000	Amount of contribution \$ 25000 Date of contribution 12/31/2003
Contributor's name, mailing address and ZIP code Nortel Networks 801 Pennsylvania Ave , NW Suite 700 Washington, DC 20004	Name of contributor's employer N/A Contributor's occupation N/A Aggregate contributions year-to-date \$ 25000	Amount of contribution \$ 25000 Date of contribution 12/31/2003

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Form 8872 (11-2002)

Schedule B Itemized Expenditures

Schedule B

27044153735

ATTACHMENT

5

27044153736

Form

8872

(November 2002)

Department of the Treasury
Internal Revenue Service**Political Organization
Report of Contributions and Expenditures**

OMB No 1545-1696

▶ See separate instructions.

A For the period beginning: 01/01/ 2004**and ending:** 03/31/2004**B Check applicable box:** ☒ Initial report ☐ Change of address ☐ Amended report ☐ Final report**1 Name of organization:** The Leadership Forum**Employer identification number:** 81 - 0576274**2 Mailing address (P.O. box or number, street, and room or suite number)**

1155 21st Street, N.W., Suite 330

City or town, state, and ZIP code

Washington, DC 20036

3 E-mail address of organization:

no@email

4 Date organization was formed:

10/28/2002

5a Name of custodian of records

Tony Zagotta

5a Custodian's address

1155 21st Street, N.W., Suite 330

Washington, DC 20036

6a Name of contact person

Tony Zagotta

6b Contact person's address

1155 21st Street, N.W., Suite 330

Washington, DC 20036

7 Business address of organization (if different from mailing address shown above). Number, street, and room or suite number

1155 21st Street, N W , Suite 330

City or town, state, and ZIP code

Washington, DC 20036

8 Type of report (check only one box)☒ First quarterly report
(due by April 15)☐ Second quarterly report
(due by July 15)☐ Third quarterly report
(due by October 15)☐ Year-end report
(due by January 31)☐ Mid-year report (Non-election
year only-due by July 31)☐ Monthly report for the month of:
(due by the 20th day following the month shown above, except the
December report, which is due by January 31)☐ Pre-election report (due by the 12th or 15th day before the election)

(1) Type of election:

(2) Date of election:

(3) For the state of:

☐ Post-general election report (due by the 30th day after general election)

(1) Date of election:

(2) For the state of:

9 Total amount of reported contributions (total from all attached Schedules A). **9. \$ 100506****10 Total amount of reported expenditures (total from all attached Schedules B).** **10. \$ 4094**

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Barbara Bonfiglio

04/15/2004

**Sign
Here**

Signature of authorized official

Date

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Schedule A Itemized Contributions

Schedule A

Contributor's name, mailing address and ZIP code Association of American Railroads 50 F Street, NW Washington, DC 20001 - 1564	Name of contributor's employer N/A	Amount of contribution \$ 25000
	Contributor's occupation N/A	Date of contribution 01/22/2004
	Aggregate contributions year-to-date \$ 25000	
Contributor's name, mailing address and ZIP code Guardian Industries Corporation 2300 Harmon Road Auburn Hills, MI 48326	Name of contributor's employer N/A	Amount of contribution \$ 25000
	Contributor's occupation N/A	Date of contribution 02/06/2004
	Aggregate contributions year-to-date \$ 25000	
Contributor's name, mailing address and ZIP code Union Pacific Corporation 600 13th St NW Suite 340 Washington, DC 20005	Name of contributor's employer N/A	Amount of contribution \$ 25000
	Contributor's occupation N/A	Date of contribution 02/27/2004
	Aggregate contributions year-to-date \$ 25000	
Contributor's name, mailing address and ZIP code Wachovia Bank P.O. Box 563966 Charlotte, NC 28262	Name of contributor's employer N/A	Amount of contribution \$ 219
	Contributor's occupation N/A	Date of contribution 02/27/2004
	Aggregate contributions year-to-date \$ 354	
Contributor's name, mailing address and ZIP code Pfizer, Inc. 235 E 42nd St. New York, NY 10017	Name of contributor's employer N/A	Amount of contribution \$ 25000
	Contributor's occupation N/A	Date of contribution 01/22/2004
	Aggregate contributions year-to-date \$ 25000	
Contributor's name, mailing address and ZIP code Wachovia Bank P.O. Box 563966 Charlotte, NC 28262	Name of contributor's employer N/A	Amount of contribution \$ 287
	Contributor's occupation N/A	Date of contribution 03/31/2004
	Aggregate contributions year-to-date \$ 640	

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Schedule B Itemized Expenditures

Schedule B

Recipient's name, mailing address and ZIP code

DCI Group, Inc
7320 N. Dreamy Draw Drive
Phoenix, AZ 85020

Name of recipient's employer

N/A
Recipients's occupation
N/A

Amount of Expenditure

\$ 690
Date of expenditure
01/16/2004

Purpose of expenditure

printing expenses

Recipient's name, mailing address and ZIP code

DCI Group, Inc
7320 N. Dreamy Draw Drive
Phoenix, AZ 85020

Name of recipient's employer

N/A
Recipients's occupation
N/A

Amount of Expenditure

\$ 48
Date of expenditure
01/20/2004

Purpose of expenditure

printing expenses

Recipient's name, mailing address and ZIP code

Matt Blunt for Governor
606 Dix Road
Jefferson City, MO 65109

Name of recipient's employer

Governor
Recipients's occupation
N/A

Amount of Expenditure

\$ 1200
Date of expenditure
02/17/2004

Purpose of expenditure

Contribution

Recipient's name, mailing address and ZIP code

McKenna Long and Aldridge
303 Peachtree Street NE Suite 5300
Atlanta, GA 30308

Name of recipient's employer

N/A
Recipients's occupation
N/A

Amount of Expenditure

\$ 2156
Date of expenditure
03/30/2004

Purpose of expenditure

legal fees

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